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**ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA, Plaintiff, vs. ADOLFO VARGAS LEPE, Defendant.	CR 23-79-BLG-SPW UNITED STATES' NOTICE OF EXPERT WITNESS UNDER FEDERAL RULES OF CRIMINAL PROCEDURE 16(a)(1)(G)
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The United States of America, by and through Assistant United States Attorneys Zeno B. Baucus and Ryan G. Weldon, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, hereby provides notice of the anticipated testimony of the following expert witness:

1. Radhiyah Himawan, Forensic Chemist
U.S. Department of Justice
Drug Enforcement Administration
Western Laboratory, Pleasanton, CA

Ms. Himawan's opinions are reflected in her DEA Laboratory Reports provided in discovery, which are signed by Ms. Himawan. Ms. Himawan is expected to testify that she examined and analyzed the substances contained in the exhibits that were submitted for analysis in the above-referenced case. Ms. Himawan analyzed exhibits submitted for analysis. Her analysis determined, as stated in the drug laboratory reports, that each exhibit had a substance identified as Methamphetamine Hydrochloride or Cocaine. Pursuant to Fed. R. Crim. P. 16(a)(1)(G)(v), an executed summary of her anticipated testimony has been provided in discovery, as has a copy of her curriculum vitae.

Ms. Himawan will further testify as to the basis of her opinions, including the standard operating procedures of the DEA Western Laboratory in receiving, storing, and analyzing submitted items, and the means, methods, and instruments used in her analysis of the items. The Case Details Report regarding Ms. Himawan's analysis of the submitted items has been provided in discovery. It is not

anticipated that Ms. Himawan will also be testifying as a lay witness.

DATED this 7th day of March, 2024.

JESSE A. LASLOVICH
United States Attorney

/s/ Zeno B. Baucus
Assistant U.S. Attorney
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2024, a copy of the foregoing document was served on the following persons by the following means:

- (1,2) CM/ECF
- ☐ Hand Delivery
- ☐ U.S. Mail
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- ☐ Fax
- ☐ E-Mail

1. Clerk, U.S. District Court

1. Edward Werner
Counsel for defendant

/s/ Zeno B. Baucus
Assistant U.S. Attorney
Attorney for Plaintiff